



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF SR-6J

VIA ELECTRONIC MAIL AND USPS

March 10, 2008

Jennifer Hale
Environment Health & Safety, WTC 2G2
P.O. Box 9777
Federal Way, WA 98063-9777

Re: Weyerhaeuser comments on Five Year Review Report

Dear Ms. Hale,

The United States Environmental Protection Agency Region 5 (US EPA) has received Weyerhaeuser's letter dated January 15, 2008, which identified several concerns with the Five Year Review of the Allied Paper/Kalamazoo River Superfund Site (Site). The Site-wide Five Year Review report was issued by US EPA on October 18, 2007. Weyerhaeuser's concerns focused on the 12th Street Landfill operable unit of the Site (OU4).

Most importantly, Weyerhaeuser raised a concern about US EPA's conclusion that the 12th St. remedy is not protective. Weyerhaeuser should not construe this conclusion to be any statement about the protectiveness of the remedy as it will ultimately be constructed at this part of the Site. Although some remedial construction at OU4 has begun in order to accommodate the time-critical work at the Plainwell Impoundment, the remedy for OU4 is still primarily in the Remedial Design phase. US EPA had no expectation that the remedy for OU4 would be completely protective as of the date of the Five Year Review report. US EPA continues to believe that, if Weyerhaeuser implements the cleanup remedy as required by the September 21, 2001 Record of Decision (ROD) and the Consent Decree (1:05 CV0003), then the remedy for OU4 will become fully protective of human health and the environment.

Weyerhaeuser is also concerned about the statement in the Five Year Review report regarding the necessity of a fence around OU4. US EPA understands that the fencing around OU4 has been improved due to the work currently underway at the Plainwell Impoundment, and that access to the area is restricted. At this point in time, therefore, U.S. EPA believes that further fencing is not required to ensure protectiveness.

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US EPA appreciates your raising these concerns, and will include both Weyerhaeuser's letter and this response in the Administrative Record. If you have further questions or concerns, please feel free to contact me.

Sincerely,

Michael Berkoff, Remedial Project Manager
U.S. EPA Region 5
Superfund Division – Remedial Response Branch #1
77 W Jackson Blvd. (SR-6J)
Chicago, IL 60604

cc: E. Furey, U.S. EPA - C-14J
J. Saric, U.S. EPA - SR-6J
S. Chummar, U.S. EPA - SR-6J
P. Bucholtz, MDEQ